

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

CR 22-113 PJS/BRT

UNITED STATES OF AMERICA,

**INDICTMENT**

Plaintiff,

18 U.S.C. § 2252(a)(4)(B)

18 U.S.C. § 2252(b)(2)

v.

18 U.S.C. § 2253(a)

18 U.S.C. § 2253(b)

DOUGLAS DAN SOLOMON,

21 U.S.C. § 853(p)

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

**COUNT 1**  
**(Possession of Child Pornography)**

On or about May 15, 2019, in the State and District of Minnesota, the  
defendant,

**DOUGLAS DAN SOLOMON,**

having been previously convicted under Chapter 110 of Title 18 of the United States Code for possession of child pornography, namely a conviction on or about December 13, 2004, in United States District Court for the District of Minnesota, knowingly possessed one or more matters which contained visual depictions that has been shipped and transported using any means or facility of interstate or foreign commerce and in or affecting interstate or foreign commerce, and which were produced using materials which have been mailed, shipped, and transported using a means and facility of interstate or foreign commerce, by any means, including by computer, where the production of such

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visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, including, but not limited to, the following images described below:

<b>Filename</b>	<b>Description</b>
[REDACTED]Mfdp.mp4	Video file approximately one minute and one second long depicting an adult hand digitally penetrating the genitalia of a prepubescent girl who is naked from the waist down.
[REDACTED]al.mp4	Video file approximately 12 minutes long depicting a prepubescent girl performing oral sex on an adult male. The video then shows the adult male anally penetrating the girl with his penis.
[REDACTED]MSB.mp4	Video file approximately five minutes and 50 seconds long depicting a prepubescent girl performing oral sex on an adult male. The girl later digitally penetrates her anus with her finger while holding a foreign object against her genitalia. The end of the video shows the male above the girl while masturbating and ejaculating on her body.
[REDACTED]D63.jpg	An image file depicting a naked prepubescent girl lying down. She is blindfolded and her hands are tied together over her head. There is a dog licking the girl's genitals.
[REDACTED]ot.avi	Video file approximately two minutes and one second long depicting an adult male masturbating and ejaculating on the face of a prepubescent girl.

all in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

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### **FORFEITURE ALLEGATIONS**

Upon conviction of Count 1 of the Indictment, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

(1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110, United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

The property subject to forfeiture includes, but is not limited to, the following:

- (a) Sandisc Cruzer Thumb Drive;
- (b) Seagate Free Agent, Serial Number 9QG5JPRP;
- (c) ASUS Verizon Tablet, IMEI: 357185082448935;
- (d) Dell desktop computer, Serial Number 5Y1XVL1;
- (e) HP desktop computer, Serial Number 2UA22910GY;
- (f) Black unmarked desktop tower; and

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(g) Blue thumb drive labeled “Online Training Academy”

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON